

Charles Wohlrab, Esq.

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Attorneys for Selene Finance LP as Servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust

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UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

-----X

IN RE:

Kurt N. Kvist

Debtor

CASE NO.: 19-21587-MBK

CHAPTER 13

Judge: Michael B. Kaplan

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**NOTICE OF OBJECTION TO CONFIRMATION OF AMENDED PLAN**

**PLEASE TAKE NOTICE** that Selene Finance LP as Servicer for Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust (“Secured Creditor”), the holder of a mortgage on real property of the Debtor, located at 19 Grover Avenue, South Amboy, NJ 08879 by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Amended Plan on grounds including:

1. Debtor filed a modified Chapter 13 plan (Doc. No.: 139) on September 22, 2023.
2. Debtor’s plan misidentifies Secured Creditor. The Secured Creditor’s interest is secured by 19 Grover Avenue, South Amboy, NJ 08879, not 77 West St., Colonia, NJ 07067.
3. Debtor’s plan base is insufficient to provide for the claim of Secured Creditor. The objecting creditor is due arrears of \$ 11,218.14 per Claim 8-1 filed on December 6, 2019.
4. Debtor’s plan proposes to pay the Secured Creditor in full through the plan and proposed that the amount required to be paid in full is \$0.00.
5. Debtor’s plan proposes a speculative post-petition mortgage.

6. Debtor's proposed plan fails to comply with the requirements of the Bankruptcy Code and is not proposed in good faith.
7. Debtor's proposed plan fails to comply with other applicable provisions of Title 11.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: October 18, 2023  
Garden City, New York

By: /s/ Charles Wohlrab  
Charles Wohlrab, Esq.  
**FRIEDMAN VARTOLO LLP**  
1325 Franklin Avenue, Suite 160  
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UNITED STATES BANKRUPTCY COURTDISTRICT  
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**Caption in Compliance with D.N.J. LBR 9004-1(b)**

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In Re:  
Kurt N. Kvist  
Debtor

Case No.: 19-21587-MBK

Chapter: 13

Adv. No.:

Hearing Date:

Hon. Judge: Michael B. Kaplan

**CERTIFICATION OF SERVICE**

1. I, Christopher Janusas:

☐ represent \_\_\_\_\_ in this matter.

☒ am the secretary/paralegal for Charles Wohlrab, Esq., who represents  
Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for  
Pretium Mortgage Acquisition Trust in this matter.

2. On October 18, 2023, I sent a copy of the following pleadings and/or documents to the parties listed  
in the chart below.

- Objection to Plan (NJ)

3. I certify under penalty of perjury that the above documents were sent using the mode of service  
indicated.

Date: October 18, 2023

/s/ Charles Wohlrab  
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Kurt N. Kvist 77 West Street Colonia, NJ 07067	Debtor(s)	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)
U.S. Trustee One Newark Center, Suite 2100 Newark Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)
Robert C. Nisenson 10 Auer Court Suite E East Brunswick, NJ 08816	Debtor(s) Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)
Albert Russo CN 4853 Trenton, NJ 08650-4853	Bankruptcy Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)